

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CRIMINAL NO. 09-109 (JNE/JJK)

M-13-461

UNITED STATES OF AMERICA,)	SUPERSEDING INDICTMENT
)	
Plaintiff,)	(18 U.S.C. § 2)
)	(18 U.S.C. § 1956(a)(1)(B)(ii))
v.)	(18 U.S.C. § 1956(h))
)	(18 U.S.C. § 982(a)(1))
1. ROBERTO GUADALUPE ALEMAN,)	(21 U.S.C. § 841(a)(1))
a/k/a "Cono,")	(21 U.S.C. § 841(b)(1)(A))
)	(21 U.S.C. § 841(b)(1)(B))
2. MARIA ISABEL ALEMAN,)	(21 U.S.C. § 841(b)(1)(C))
)	(21 U.S.C. § 846)
3. JUAN FIDEL ALEMAN,)	(21 U.S.C. § 853(a)(1))
)	(21 U.S.C. § 853(a)(2))
4. DANIEL ARMANDO ALEMAN,)	(21 U.S.C. § 853(p))
)	
5. ERNESTO JIMENEZ GUZMAN,)	
a/k/a "Neto,")	
)	
6. ESAUL MIRANDA,)	
a/k/a Hector Diaz,)	
a/k/a "Pajaro,")	
)	
7. JESUS VILLANUEVA,)	
a/k/a "Yope,")	
)	
8. NICOLAS LARA MUNOZ,)	
a/k/a "Nico,")	
)	
9. JOSUE AZAHAEAL GARZA,)	
a/k/a "Pee Wee,")	
)	
10. EMILY JUDITH BALDERAS,)	
a/k/a "Zapata,")	
)	
11. ARCELIA REYES,)	
)	
12. ANDRES GUZMAN FEGAROA,)	
)	
13. MARIA LUISA STAY,)	
a/k/a "Marilu,")	
)	
14. MARIA ALMAGUER,)	
a/k/a "Malena,")	
)	
15. OSCAR DAMIAN LIMON,)	
a/k/a "Emilio,")	

SCANNED

MAY 19 2009

U.S. DISTRICT COURT MPLS

FILED MAY 19 2009

RICHARD D. SLETTEN

JUDGMENT ENTD

DEPUTY CLERK

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

16. BARTOLO ENRIQUE VEGA, JR.,)
a/k/a "Ricky,")
a/k/a "Bori,")
a/k/a "Boriqua,")
)
17. CARLOS ALEJANDRO AZHAM)
MARTINEZ,)
a/k/a "Charlie,")
)
18. DAVID PAUL HARLANDER,)
)
19. LUIZ GERARDO FLORES,)
a/k/a "Wicho,")
)
20. REFUGIO HERNANDEZ MUNIZ,)
a/k/a "Kookie,")
a/k/a "Kooky,")
)
21. RAFAEL QUINTANILLA,)
a/k/a "Rafa,")
)
22. RICARDO QUINTANILLA,)
)
23. LUIZ MANUEL ROMAN,)
a/k/a "Maceton,")
)
24. MIRIAM LEAL,)
)
25. ALEJANDRO PAZ,)
)
26. MARTIN JIMENEZ,)
a/k/a "Bernie,")
a/k/a "Mamao," and)
)
27. RODOLFO TELLO-MUNOZ,)
a/k/a Manuel Torres Munoz,)
a/k/a Rodolfo Tello-Aros,)
a/k/a "Viejon,")
)
Defendants.)

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy To Distribute Methamphetamine and Cocaine)

From on or about December 29, 2005, through on or about April 29, 2009, in the State and District of Minnesota and elsewhere, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"
MARIA ISABEL ALEMAN,
JUAN FIDEL ALEMAN,
DANIEL ARMANDO ALEMAN,
ERNESTO JIMENEZ GUZMAN,
a/k/a "Neto,"
ESAUL MIRANDA,
a/k/a Hector Diaz,
a/k/a "Pajaro,"
JESUS VILLANUEVA,
a/k/a "Yope,"
NICOLAS LARA MUNOZ,
a/k/a "Nico,"
JOSUE AZAHAEAL GARZA,
a/k/a "Pee Wee,"
EMILY JUDITH BALDERAS,
a/k/a "Zapata,"
ARCELIA REYES,
ANDRES GUZMAN FEGAROA,
MARIA LUISA STAY,
a/k/a "Marilu,"
MARIA ALMAGUER,
a/k/a "Malena,"
OSCAR DAMIAN LIMON,
a/k/a "Emilio,"
BARTOLO ENRIQUE VEGA, JR.,
a/k/a "Ricky,"
a/k/a "Bori,"
a/k/a "Boriqua,"
CARLOS ALEJANDRO AZHAM MARTINEZ,
a/k/a "Charlie,"
DAVID PAUL HARLANDER,

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

LUIZ GERARDO FLORES,
a/k/a "Wicho,"
REFUGIO HERNANDEZ MUNIZ,
a/k/a "Kookie,"
a/k/a "Kooky,"
RAFAEL QUINTANILLA,
a/k/a "Rafa,"
RICARDO QUINTANILLA,
LUIZ MANUEL ROMAN,
a/k/a "Maceton,"
MIRIAM LEAL,
ALEJANDRO PAZ,
MARTIN JIMENEZ,
a/k/a "Bernie,"
a/k/a "Mamao," and
RODOLFO TELLO-MUNOZ,
a/k/a Manuel Torres Munoz,
a/k/a Rodolfo Tello-Aros,
a/k/a "Viejon,"

knowingly and intentionally conspired with each other and with other persons, whose names are known and unknown to the grand jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine and 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, both controlled substances, each in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

COUNT 2

(Conspiracy To Commit Money Laundering)

From on or about December 29, 2005, through on or about April 29, 2009, in the State and District of Minnesota and elsewhere, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"
MARIA ISABEL ALEMAN,

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

DANIEL ARMANDO ALEMAN,
ESAUL MIRANDA,
a/k/a Hector Diaz,
a/k/a "Pajaro,"
JESUS VILLANUEVA,
a/k/a "Yope,"
NICOLAS LARA MUNOZ,
a/k/a "Nico,"
MARIA LUISA STAY,
a/k/a "Marilu,"
MARIA ALMAGUER,
a/k/a "Malena,"
RAFAEL QUINTANILLA,
a/k/a "Rafa,"
RICARDO QUINTANILLA,
LUIZ MANUEL ROMAN,
a/k/a "Maceton,"
MIRIAM LEAL,
ALEJANDRO PAZ, and
MARTIN JIMENEZ,
a/k/a "Bernie,"
a/k/a "Mamao,"

knowingly and intentionally conspired with each other and with other persons, whose names are known and unknown to the grand jury, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, the offense charged in Count 1 of this Indictment, to avoid transaction reporting requirements under Federal law, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the transactions represented the proceeds of some form of unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii) and 1956(h).

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

COUNT 3

(Distribution of Cocaine)

On or about June 3, 2005, in the State and District of Minnesota, the defendant,

JUAN FIDEL ALEMAN,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

(Distribution of Methamphetamine)

On or about July 8, 2005, in the State and District of Minnesota, the defendant,

JUAN FIDEL ALEMAN,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

(Aiding and Abetting Distribution of Cocaine)

In or about May, 2008, in the State and District of Minnesota, the defendant,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and intentionally distributed 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 6

(Aiding and Abetting Distribution of Cocaine)

On or about July 2, 2008, in the State and District of Minnesota, the defendants,

**ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono," and
DANIEL ARMANDO ALEMAN,**

each aiding and abetting the other, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 7

(Distribution of Cocaine)

On or about July 7, 2008, in the State and District of Minnesota, the defendant,

**ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"**

knowingly and intentionally distributed 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 8

(Aiding and Abetting Distribution of Cocaine)

On or about July 18, 2008, in the State and District of Minnesota, the defendants,

**DANIEL ARMANDO ALEMAN, and
MARIA LUISA STAY,
a/k/a "Marilu,"**

each aiding and abetting the other, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 9

(Aiding and Abetting Distribution of Cocaine)

On or about August 14, 2008, in the State and District of Minnesota, the defendants,

**DANIEL ARMANDO ALEMAN, and
JUAN FIDEL ALEMAN,**

each aiding and abetting the other, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

COUNT 10
(Distribution of Cocaine)

On or about September 17, 2008, in the State and District of Minnesota, the defendant,

JUAN FIDEL ALEMAN,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 11
(Aiding and Abetting Distribution of Cocaine)

On or about October 9, 2008, in the State and District of Minnesota, the defendant,

JUAN FIDEL ALEMAN,

others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 12
(Aiding and Abetting Distribution of Cocaine)

On or about October 10, 2008, in the State and District of Minnesota, the defendants,

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

**JUAN FIDEL ALEMAN, and
MARIA LUISA STAY,
a/k/a "Marilu,"**

each aiding and abetting the other, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 13

(Possession with Intent To Distribute Cocaine)

On or about October 22, 2008, in the State and District of Minnesota, the defendant,

**NICOLAS LARA MUNOZ,
a/k/a "Nico,"**

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 14

(Aiding and Abetting Distribution of Cocaine)

On or about November 4, 2008, in the State and District of Minnesota, the defendants,

**ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono," and
JUAN FIDEL ALEMAN,**

each aiding and abetting the other, knowingly and intentionally distributed a mixture or substance containing a detectable amount

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 15

(Distribution of Cocaine)

On or about November 27, 2008, in the State and District of Minnesota, the defendant,

REFUGIO HERNANDEZ MUNIZ,
a/k/a "Kookie,"
a/k/a "Kooky,"

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 16

(Aiding and Abetting Distribution of Cocaine)

On or about January 14 2009, in the State and District of Minnesota, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"
JUAN FIDEL ALEMAN, and
MARIA AMALGUER,
a/k/a "Malena,"

each aiding and abetting the other, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and(b)(1)(C), and Title 18, United States Code, Section 2.

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

COUNT 17

(Distribution of Cocaine)

On or about January 19, 2009, in the State and District of Minnesota, the defendant,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 18

(Possession with Intent To Distribute Cocaine)

On or about January 19, 2009, in the State and District of Minnesota, the defendant,

DAVID PAUL HARLANDER,

knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 19

(Distribution of Cocaine)

On or about January 21, 2009, in the State and District of Minnesota, the defendant,

REFUGIO HERNANDEZ MUNIZ,
a/k/a "Kookie,"
a/k/a "Kooky,"

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 20

(Distribution of Cocaine)

On or about February 4, 2009, in the State and District of Minnesota, the defendant,

REFUGIO HERNANDEZ MUNIZ,
a/k/a "Kookie,"
a/k/a "Kooky,"

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 21

(Aiding and Abetting Possession with Intent
To Distribute Cocaine)

On or about February 4, 2009, in the State and District of Minnesota, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"
MARIA ISABEL ALEMAN,
ERNESTO JIMENEZ GUZMAN,
a/k/a "Neto,"
EMILY JUDITH BALDERAS,
a/k/a "Zapata," and
JOSUE AZAHAEAL GARZA,
a/k/a "Pee Wee,"

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

each aiding and abetting the others, knowingly and intentionally possessed with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18 United States Code, Section 2.

COUNT 22

(Distribution of Cocaine)

On or about February 4, 2009, in the State and District of Minnesota, the defendant,

OSCAR DAMIAN LIMON,
a/k/a "Emilio,"

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 23

(Aiding and Abetting Possession with Intent
To Distribute Cocaine)

On or about February 12, 2009, in the State and District of Minnesota, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono," and
JESUS VILLANUEVA,
a/k/a "Yope,"

each aiding and abetting the other, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 24

(Aiding and Abetting Distribution Cocaine)

On or about February 24, 2009, in the State and District of Minnesota, the defendant,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"

others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and intentionally distributed 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 25

(Possession with Intent To Distribute Cocaine)

On or about February 24, 2009, in the State and District of Minnesota, the defendant,

LUIZ GERARDO FLORES,
a/k/a "Wicho,"

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 26

(Aiding and Abetting Distribution of Cocaine)

On or about February 27, 2009, in the State and District of Minnesota, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"
ESAUL MIRANDA,
a/k/a Hector Diaz,
a/k/a "Pajaro," and
CARLOS ALEJANDRO AZHAM MARTINEZ,
a/k/a "Charlie,"

each aiding and abetting the others, knowingly and intentionally distributed 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 27

(Possession with Intent To Distribute Cocaine)

On or about February 27, 2009, in the State and District of Minnesota, the defendant,

OSCAR DAMIAN LIMON,
a/k/a "Emilio,"

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

COUNT 28

(Aiding and Abetting Possession with Intent
To Distribute Cocaine)

On or about March 12, 2009, in the State and District of
Minnesota, the defendants,

**ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"
MARIA ISABEL ALEMAN,
JESUS VILLANUEVA,
a/k/a "Yope," and
ANDRES GUZMAN FEGAROA,**

each aiding and abetting the others, knowingly and intentionally
possessed with intent to distribute 500 grams or more of a mixture
or substance containing a detectable amount of cocaine, a
controlled substance, in violation of Title 21, United States Code,
Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States
Code, Section 2.

COUNT 29

(Aiding and Abetting Distribution of Cocaine)

On or about March 23, 2009, in the State and District of
Minnesota, the defendants,

**ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono,"
JUAN FIDEL ALEMAN, and
MARIA LUISA STAY,
a/k/a "Marilu,"**

each aiding and abetting the others, knowingly and intentionally
distributed a mixture or substance containing a detectable amount
of cocaine, a controlled substance, in violation of Title 21,

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 30

(Aiding and Abetting Distribution of Cocaine)

On or about March 24, 2009, in the State and District of Minnesota, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono," and
MARIA LUISA STAY,
a/k/a "Marilu,"

each aiding and abetting the other, knowingly and intentionally distributed 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 31

(Possession with Intent To Distribute Cocaine)

On or about March 24, 2009, in the State and District of Minnesota, the defendant,

BARTOLO ENRIQUE VEGA, JR.,
a/k/a "Ricky,"
a/k/a "Bori,"
a/k/a "Boriqua,"

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

COUNT 32

(Aiding and Abetting Possession with Intent
To Distribute Cocaine)

On or about April 25, 2009, in the State and District of
Minnesota, the defendants,

ROBERTO GUADALUPE ALEMAN,
a/k/a "Cono," and
MARIA ISABEL ALEMAN,
ESAUL MIRANDA,
a/k/a Hector Diaz,
a/k/a "Pajaro," and
ARCELIA REYES,

each aiding and abetting the others, knowingly and intentionally
possessed with intent to distribute 500 grams or more of a mixture
or substance containing a detectable amount of cocaine, a
controlled substance, in violation of Title 21, United States Code,
Sections 841(a)(1) and 841(b)(1)(B), and Title 18 United States
Code, Section 2.

COUNT 33

(Possession with Intent To Distribute Cocaine)

On or about April 29, 2009, in the State and District of
Minnesota, the defendant,

RODOLFO TELLO-MUNOZ,
a/k/a Manuel Torres Munoz,
a/k/a Rodolfo Tello-Aros,
a/k/a "Viejon,"

knowingly and intentionally possessed with intent to distribute 500
grams or more of a mixture or substance containing a detectable

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

Forfeiture Allegations

If convicted of any of Counts 1 or 3 through 33 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations. The property subject to forfeiture includes, but is not limited to, the following:

a. at least \$2.5 million in United States Currency and all interest and proceeds traceable thereto, in that such sum in aggregate constitutes proceeds of the charged offenses, property involved in or facilitating such offenses, or was received in exchange for the distribution of controlled substances, and was subsequently expended, spent, distributed or otherwise disposed of by the defendants;

b. the real property located at 808 and 810 South 3rd, Hidalgo, Texas, together with any and all buildings, fixtures and appurtenances thereto;

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

c. the real property located at 1610 East Flora Avenue, Hidalgo, Texas, together with any and all buildings, fixtures and appurtenances thereto;

d. approximately \$35,680 in U.S. Currency seized on or about April 29, 2009, from the residence located at 7132 Janell Avenue North, Brooklyn Park, Minnesota;

e. approximately \$5,864 in U.S. Currency seized on or about April 29, 2009, from the real property located at 808 and 810 South 3rd, Hidalgo, Texas;

f. approximately \$120,662.05 in U.S. Currency seized on or about May 7, 2009, from various bank accounts related to the defendants;

g. a red 2001 GMC Yukon, vehicle identification number 1GKEC13T21R141372, bearing Texas license plate 17CKM2;

h. a brown 2004 Nissan Murano, vehicle identification number JN8AZ08T74W200101, bearing Texas license plate HHB303;

i. a black 2003 Lincoln Navigator, vehicle identification number 5LMFU28R23LJ00657, bearing license plate MAZ071;

j. a black 2004 Jeep Cherokee, vehicle identification number 1J4GX48S94C179855, bearing Texas license plate DKV758;

k. Norinco Model SKS 7.62 caliber rifle, serial number 1720327, seized on or about April 29, 2009;

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

l. Springfield Armory Model XD-40 .40 caliber handgun, serial number US249907, seized on or about April 29, 2009;

m. RG Industries Model RG42 .25 caliber handgun, serial number 113128, seized on or about April 29, 2009;

n. Ruger Model P93DAO 9mm handgun, serial number 306-12053, seized on or about April 29, 2009;

o. 47 rounds of CCI brand .40 caliber ammunition seized on or about April 29, 2009;

p. 11 rounds of assorted brands 7.62 caliber ammunition seized on or about April 29, 2009;

q. 11 rounds of assorted brands .40 caliber ammunition seized on or about April 29, 2009; and

r. 48 rounds of CCI brand .25 caliber ammunition seized on or about April 29, 2009.

If convicted of Count 2 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, or any property traceable to such offenses. Property forfeitable under Count 2 includes, but is not limited to the following:

a. a money judgment in excess of \$2.5 million in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate constitutes proceeds of the charged offenses, or property involved in such offenses,

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

and was subsequently expended, spent, distributed or otherwise disposed of by the defendants; and

b. approximately \$120,662.05 in U.S. Currency seized on or about May 7, 2009, from various bank accounts related to the defendants.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p). The property subject to forfeiture includes, but is not limited to, the following:

a. the real property located at and legally described as: all of Lot One Hundred Sixteen (116), Rio Grande Estates Phase 1, an addition to the City of Hidalgo, Hidalgo County, Texas, according to the map or plat thereof recorded in Volume 51, page 149, Map Records, Hidalgo County, Texas;

b. the real property located at and legally described as: All of Lot 32(32), Rio Grande Estates Phase 1, an addition of the City of Hidalgo, Hidalgo County, Texas, according to the map or plat thereof recorded in Volume 51, page 149, Map Records, Hidalgo County, Texas;

c. the real property located at 1700 East Flora Avenue, Hidalgo, Texas, together with any and all buildings, fixtures and appurtenances thereto;

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

d. the real property located at 1702 East Flora Avenue, Hidalgo, Texas, together with any and all buildings, fixtures and appurtenances thereto;

e. the real property located at 302 San Pedro, Edinburg, Texas, together with any and all buildings, fixtures and appurtenances thereto;

f. the real property located at 2149 Balboa, McAllen, Texas, together with any and all buildings, fixtures and appurtenances thereto;

g. the real property located at 2702 West 7th Street, Mission, Texas, together with any and all buildings, fixtures and appurtenances thereto;

h. the real property located at and legally described as: lot 120 Valle De La Primavera Subdivision, Hidalgo County, Texas, together with any and all buildings, fixtures and appurtenances thereto, and as shown by the plat therein recorded in Volume 33 Page 132, of the Map of Records of Hidalgo County, Texas.

i. the real property located at and legally described as: The North 5 acres of Lot 359, Bentson Groves Subdivision, Hidalgo County, Texas, together with any and all buildings, fixtures and appurtenances thereto;

j. the real property located at and legally described as: Lot 72, Citrus Trails, Hidalgo County, Texas, together

U.S. v. Roberto Guadalupe Aleman, et al.

Criminal No. 09-109 (JNE/JJK)

with any and all buildings, fixtures and appurtenances thereto; and

k. the real property located at and legally described as: The North 5 acres of Lot 414, Bentsen Groves Addition C, Hidalgo County, Texas, together with any and all buildings, fixtures and appurtenances thereto, and as shown by the plat therein recorded in Volume 7 Page 30, of the Map of Records of Hidalgo County, Texas.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), 846, 853(a)(1), 853(a)(2) and 853(p) and 853(a)(1) and (2), Title 18, United States Code, Sections 982(a)(1), 1956(A)(1)(b)(ii) and 1956(h); and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON